



October 21, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Compliance Report of Global Village; WC Docket Nos. 04-36 and 05-196

Dear Ms. Dortch:

Zoom Technologies, Inc. ("Zoom"), which operates the interconnected VoIP service known as Global Village™, will supply E911 calling capabilities to all U.S. customers as a basic (non-optional) feature of the service no later than November 28, 2005 by relying on Zoom's TelePort™ technology. Accordingly, Zoom files this letter detailing its compliance with the Commission's E911 rules for interconnected VoIP providers, as required by the *First Report and Order* in the above-reference docket.¹

Use of Zoom TelePort Equipment to Ensure E911 Service

For customers in the U.S., the Global Village service is designed to work exclusively with VoIP devices that have integrated TelePort technology, such as a TelePort-equipped ATA, DSL or cable modem, or some other TelePort-equipped device. As the attached diagrams illustrate, TelePort-equipped devices have a jack for plugging in one or more conventional telephones, a jack for interfacing to a Public Switched Telephone Network ("PSTN") phoneline, and the ability to route calls either to the Internet as VoIP calls or directly to the PSTN. When a Global Village customer dials 911, the TelePort's "smart switch" automatically routes the call over the customer's conventional telephone line. The call is handled as it would be if a conventional phone

¹ See *E911 Requirements for IP-Enabled Service Providers*, 20 FCC Rcd 10245 (2005); Public Notice, *OMB Grants Emergency Approval of New VoIP E911 Rules Adopted in IP-Enabled Services First Report and Order*; WC Docket No. 04-36, DA 05-1992 (rel. July 12, 2005) (announcing that E911 VoIP providers must provide E911 capabilities to their customers by no later than Nov. 28, 2005). Global Village has previously notified the Commission of its compliance with the requirement that customers be informed of the situations under which E911 service may be unavailable in comparison to traditional telephone service. See, e.g., Letter from Gerard J. Waldron, Counsel to Global Village to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 04-36 and 05-196 (filed Sept. 22, 2005), *attaching* Third Subscriber Notification Report.

phone was directly plugged into the customer's PSTN line, so the E911 call is routed by the telephone service provider's equipment onto the Wireline E911 Network.

The TelePort approach, routing 911 calls through the PSTN, has numerous benefits over a network-based solution to E911 compliance including the following:

1. The TelePort approach works for E911 calls even if the VoIP provider does not have an Internet-based means of connecting the customer to E911 service.
2. E911 handling with TelePort-equipped VoIP devices works even in a power outage. During a power outage the conventional telephone plugged into the TelePort-equipped device automatically connects to the live PSTN jack, typically via a relay. In contrast, devices that instead route E911 calls via a network-based solution typically cannot handle E911 calls in a power outage unless those devices have a backup power supply.
3. The TelePort approach properly identifies the user's location even if that user is nomadic. Whenever a nomadic VoIP user can plug into a live PSTN jack, that user's location is identified by the E911 service even if the nomadic user fails to update his or her registered location.

By November 28, 2005, all U.S. Global Village customers will have enhanced TelePort-equipped devices that can detect whether the device is connected to a live PSTN connection and can report this status to Global Village. Whenever a customer comes off-hook and there is a live PSTN connection, the TelePort-equipped device will detect the PSTN connection and report confirmation of this connection to Global Village. If there is no PSTN connection, the device will behave in one of two ways, depending on which TelePort-equipped equipment the customer is using. For one type of equipment, the device will report to Global Village that there is no PSTN connection. Immediately on receipt of this status, Global Village will disable the customer's ability to place interconnected VoIP calls, send an email to the customer explaining what has happened and suggesting the proper course of action, and put a notice on the customer's Global Village Web Page with the same information. For a second type of equipment, if there is no PSTN connection and a customer has been enabled for interconnected VoIP calls, the customer will hear no dial tone when he or she comes off hook. Upon reconnecting the device to the PSTN, the customer will again hear dial tone when the phone is taken off hook. For either of the two types of equipment, customers will be prevented from making VoIP calls to and from the PSTN if their TelePort-equipped equipment is not plugged into a live PSTN jack. The goal, of course, is to get the customer to establish a live PSTN connection for the TelePort-equipped equipment, thereby restoring E911 access as quickly as possible.

To ensure that this latest safety enhancement is available as a standard Global Village feature by November 28, 2005, Zoom will provide a firmware upgrade to all U.S. Global Village customers who do not have the latest generation of TelePort technology. These customers will receive detailed and user-friendly instructions for

completing the upgrade, which can be implemented using an Internet-connected PC with a standard browser. The instructions will warn consumers of the importance of this upgrade to their ability to place E911 calls, and will also make clear that if customers do not complete the upgrade, the customer will lose the ability to place VoIP calls to and from the PSTN.

Please direct any questions concerning this information to the undersigned.

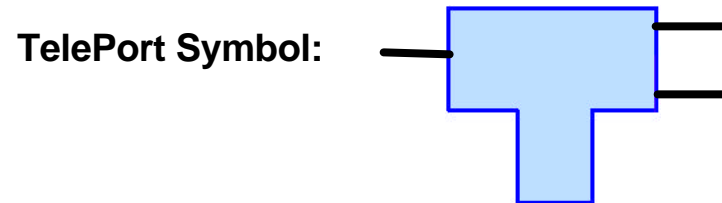
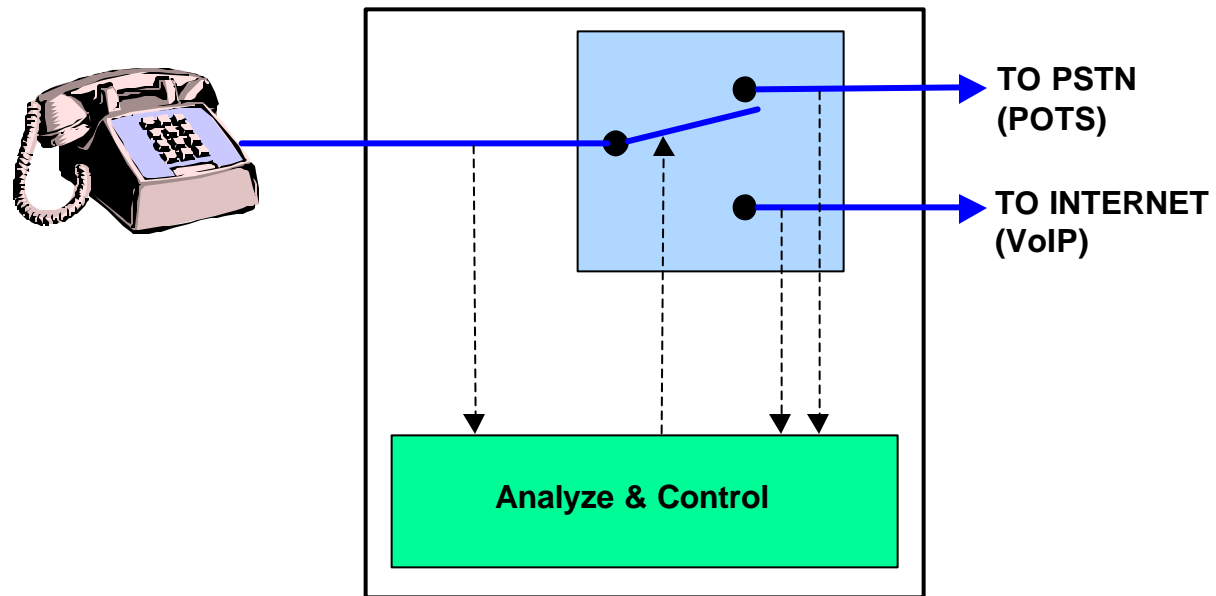
Sincerely,

A handwritten signature in black ink, appearing to read "Frank Manning". The signature is fluid and cursive, with the first name "Frank" being more prominent.

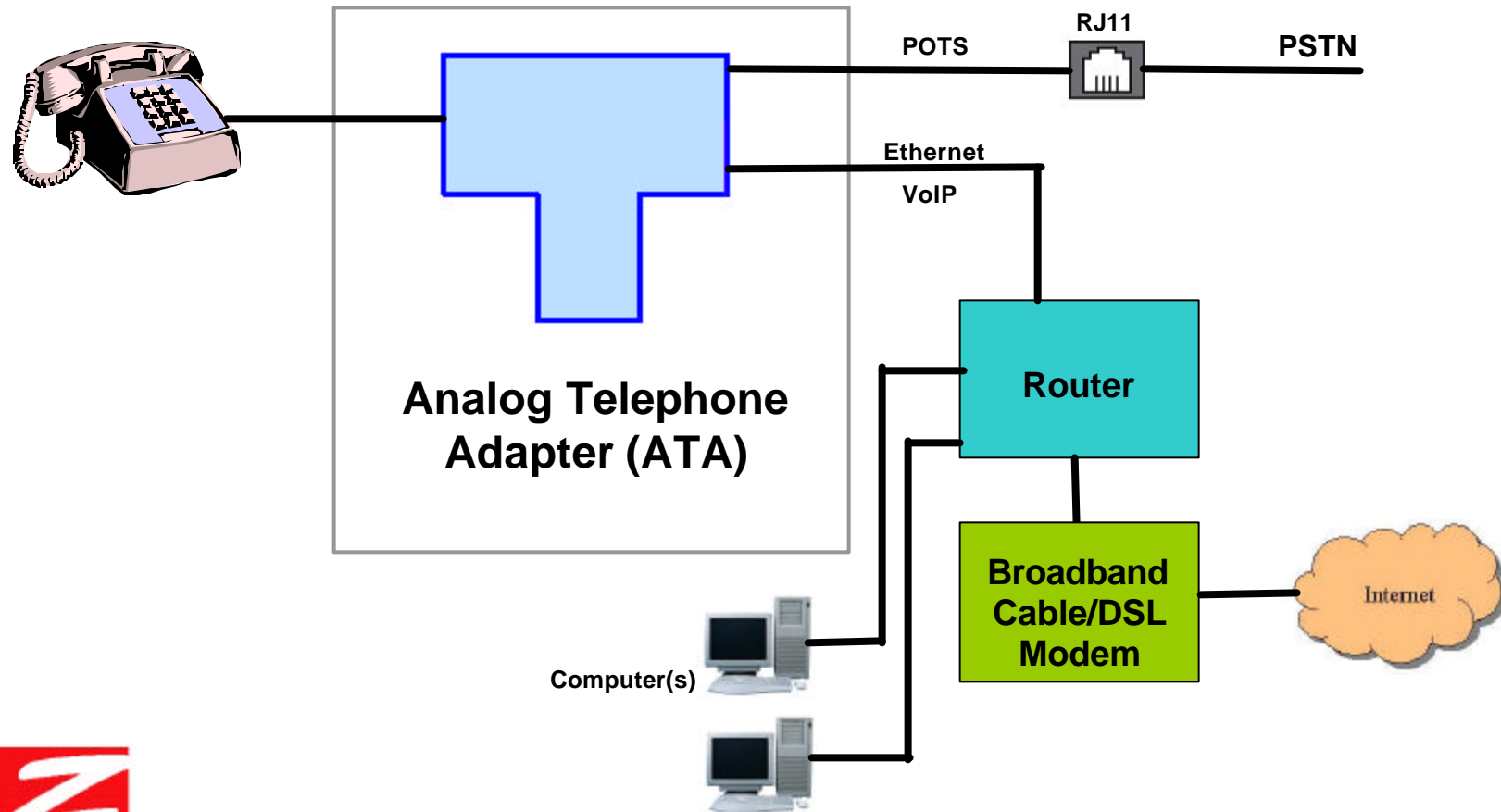
Frank Manning
President, Zoom Technologies, Inc.

cc (by e-mail): Joseph P. Casey
Kathryn S. Berhot
Nicholas Alexander

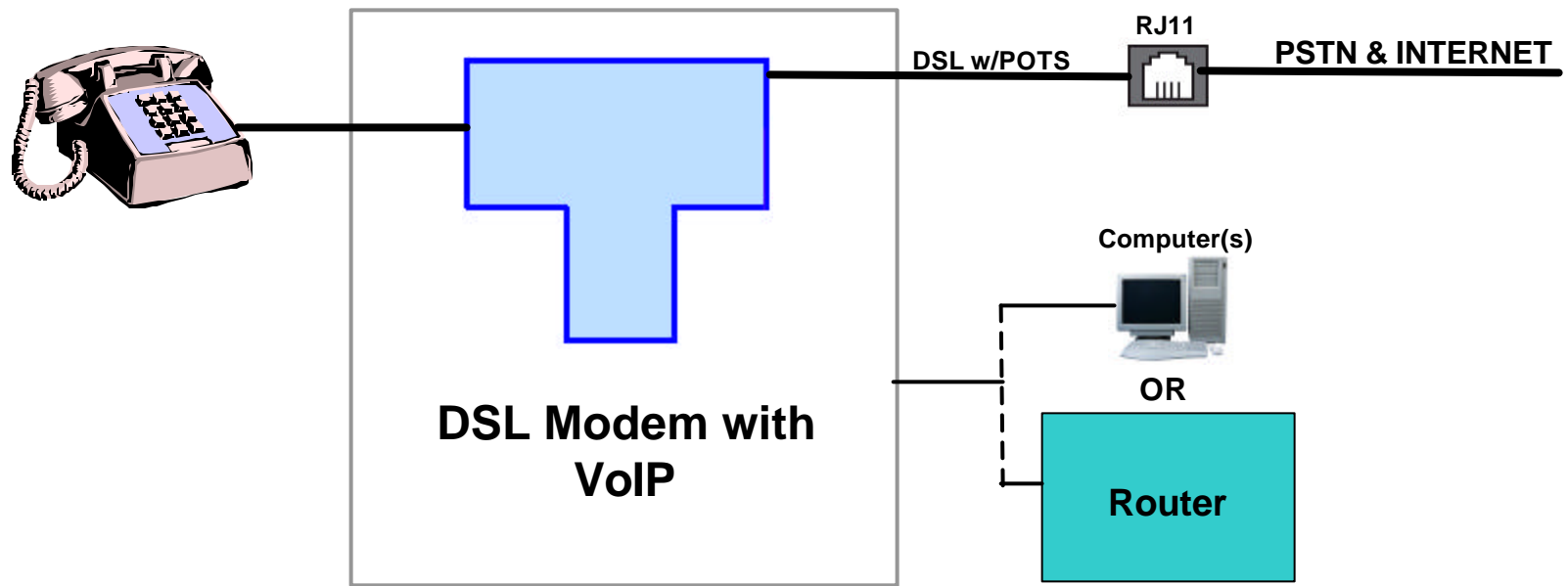
TelePort Smart Switch



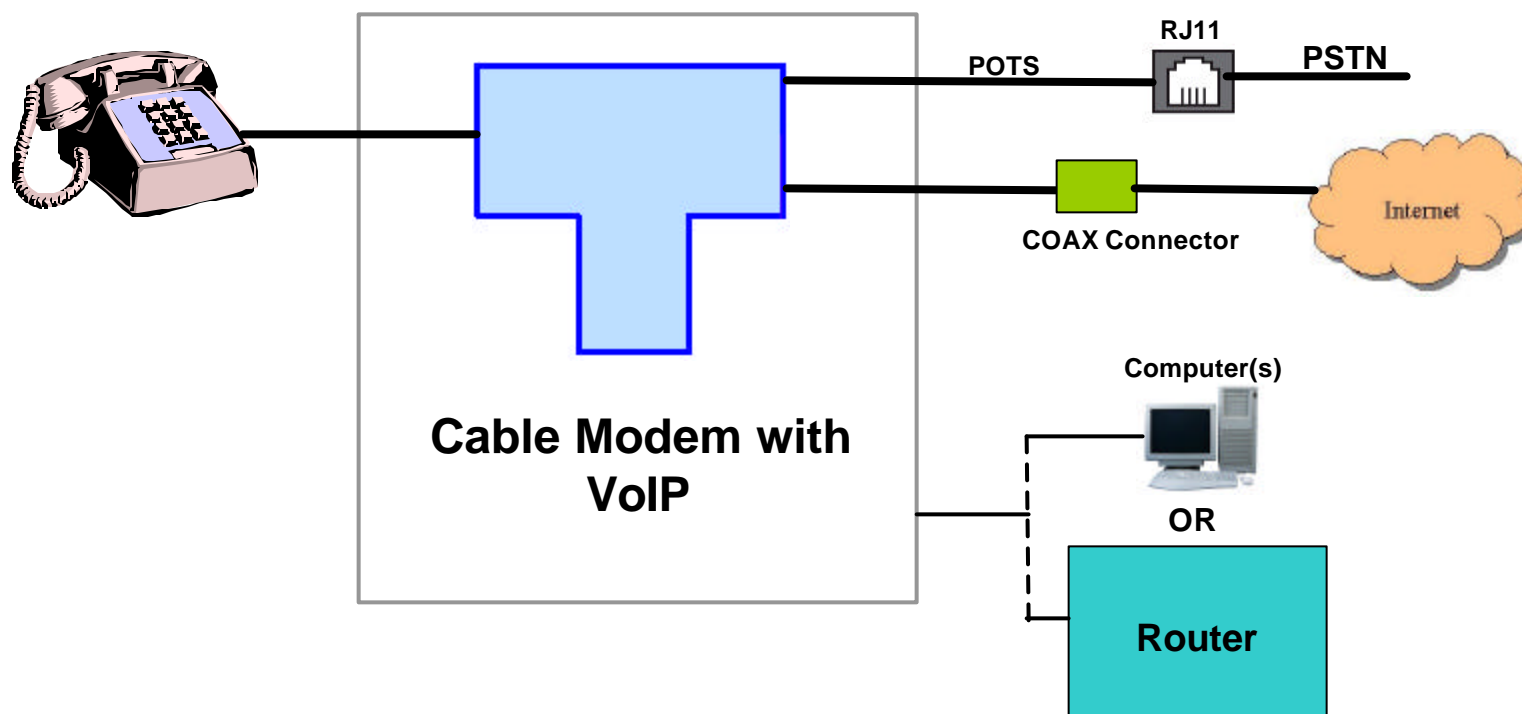
TelePort in an ATA



TelePort in a DSL Modem with VoIP



TelePort in a Cable Modem with VoIP



TelePort in an ATA/Router

